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July 25, 1994

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JUL 25 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE SUBMISSION

William F. Caton, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Automatic Vehicle Monitoring ("AVM") Systems
PR Docket 93-61

Dear Mr. Secretary:

This office on July 18, 1994 filed on behalf of an ad hoc coalition of natural gas distribution utilities ("Gas Utilities"), comments on the June 23, 1994, submission by several wide area AVM proponents.

As the Gas Utilities explained in their comments, they employ Part 15 automated meter reading ("AMR") devices operating in the 902-928 MHz band (specifically radiating in the 910-920 MHz segment of the band). Among the points made by the Gas Utilities in those comments was that the AMR devices serve important public interest functions. Those functions include the promotion of conservation of energy, protection of safety of life and property, and the interest of the consumer and utility in rendering an accurate and timely bill for services.

A recently reported event serves to underscore the importance of that last concern, the rendering of accurate and timely bills for utility service. Attached to this letter is an article reported on July 23, 1994 by The Washington Post. See D.C. Residents Shocked by Gas Bill for \$2,248.

Accordingly to The Washington Post, Rachel Carlson, a law student on a tight budget and a residential customer of Washington Gas Light Co., recently received a bill for natural gas usage in the amount of \$2,248. The high bill resulted from Washington Gas Light's inability to read the meter of Ms. Carlson's resident on Belmont Road in the Adams Morgan area of Washington for the last three years. As a result of inability to access the gas meter for readings, the company had rendered estimated bills during that time.

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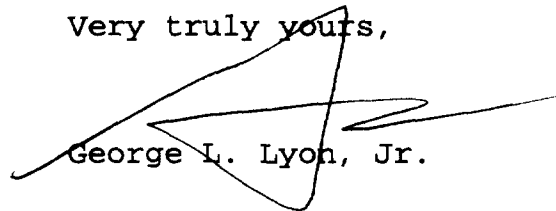
A spokesman for Washington Gas Light Co. stated that 1,400 customers of the utility have been receiving estimated bills for more than 12 months, and that some of them will likely face sizable catch-up bills.

As indicated in the newspaper article, Washington Gas Light Co. has installed 110,000 AMR devices so far and intends to install such devices by March 1995 in all homes currently receiving estimated bills.

As the Gas Utilities have explained in this proceeding, AMR is an important consumer protection service. The Washington Post article provides a real life example of how consumers face harm from the inability of utilities to provide actual meter readings. Given the increasing difficulty of utility personnel to perform on-site meters readings, it is essential that the Commission's decision in this proceeding protect the integrity of the large, installed base of AMR equipment and the ability of utilities to employ Part 15 AMR devices using the 902-928 MHz band in the future.

Should any question arise concerning this matter, kindly contact this office.

Very truly yours,

A handwritten signature in dark ink, appearing to be "George L. Lyon, Jr.", written over a horizontal line.

GLL/pc
Attachment
cc: Attached Service List

SATURDAY, JULY 23, 1994

The Washington Post

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JUL 25 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

BUSINESS

D.C. Residents Shocked by Gas Bill for \$2,248

By Daniel Southerland
Washington Post Staff Writer

Rachel Carlson, a law student on a tight budget, was shocked when she opened the mail recently and found a monthly gas bill for \$2,248.28.

Carlson, 23, and four others sharing a brick house in the District had been paying bills ranging from \$50 to \$60 a month.

"When I first saw the bill, I laughed," said Carlson. "I thought this couldn't be real. Then I was like ... what if it is real?"

Unfortunately for Carlson and her roommates, the bill is real.

Washington Gas Light Co. said that the five tenants, and others previously renting the rooms they lived in, had been undercharged for the past three years. And now, Carlson and her four roommates were holding a huge "catch-up bill."

The company said that Washington Gas workers who normally monitor gas meters could not get access to the meter inside Carlson's house

on Belmont Road in Adams Morgan for three years. As a result, the company had sent out bills based on its estimates of gas usage at the house.

But those estimates had been too low, the company said, and when it finally got access to the building in May, it came up with a more accurate reading.

Paul Young, a spokesman for Washington Gas, said that 1,400 customers in the District have been getting estimated bills for 12 months or longer, and that some of them are likely to face sizable catch-up bills. But he said that Carlson's bill was unusually high.

The bills don't make customers very happy. Young said the company's most frequent customer complaints concern estimated bills.

Young said that if the company cannot get access to a meter, it estimates the bill for two months. The company bases the estimates on how cold or warm the weather has been and how much gas a customer used

See GAS, F8, Col. 5

D.C. Residents Are Shocked By Big 'Catch-Up' Gas Bill

GAS, From F1

in previous months. After two months, the company leaves a card asking the customer to read the meter and mark on the card the exact position of hands on the meter dials.

After seven consecutive months of estimated bills, the company is supposed to try to arrange a meeting with the customer that would allow access to the meter.

To eliminate customer shock from catch-up bills, the company hopes to install remote meter reading devices by March 1995 in all of the homes that currently are receiving estimated bills, Young said. He said the company already has installed remote-reading devices in meters at 110,000 locations out of a total of 150,000 in the District.

The system uses low-level FM ra-

dio technology to read meters. A van drives by the house and sends a "wake-up" signal to a unit attached to the gas meter. The meter reading is transmitted to the computer in the van and then to the company's billing department. According to the gas company, the system is accurate and can do away with estimated bills.

Carlson, entering her third year as a law student at Georgetown University, said now that she knows what happened, she has no argument with her gas bill.

But she hopes that her landlord can arrange for others who came before her at the Belmont Road house to pay their share. And, she said, the gas company ought to provide more of an explanation when it drops a monthly gas bill of more than \$2,000 on a doorstep.

534-138037 MAY 24, 94 JUN 23, 94 30

READ BY 2705 2668 37 1.024 37.4

COMPANY

1710 BELMONT RD NW

BALANCE FROM PREVIOUS BILL \$2,146.53

LATE PAYMENT CHARGE ASSESSED 22.21

CURRENT GAS USAGE - 37.9 THERMS @ \$.7793 29.52

CUSTOMER CHARGE RESIDENTIAL HEATING/COOLING .00

PURCHASED GAS ADJUSTMENT @ \$.0428 PER THERM 1.62

INTERRUPTIBLE SALES CREDIT @ \$ -.0444 PER THERM 1.70

INCREASE IN DC GROSS RECEIPTS TAX .16

DC SALES TAX @ 7 PERCENT - NOT APPLICABLE .00

IF YOU HAVE ANY QUESTIONS, PLEASE CALL (703) 750-1000
WE ARE EASIEST TO REACH TUESDAY THROUGH THURSDAY AFTER 10 AM.

DISCONTINUANCE NOTICE

YOUR DAILY PAYMENTS	DAYS	TOTAL CCF	CCF/DAY
AMOUNT DUE NOW		\$ 2,248.28	
AMOUNT DUE AFTER JUL 23, 94		\$ 2,281.86	

NOTICE: DISCONTINUANCE OF GAS SERVICE
If you do not pay your bill by the due date, your gas service will be discontinued. You will be responsible for the cost of reconnection and any other charges. JUL 15, 1994

534-138037

Rachel Carlson was shocked to receive a \$2,248.28 gas bill after paying \$50 to \$60 in an average month.

CERTIFICATE OF SERVICE

I, Lydia N. Hicks, Secretary, at the law firm of Lukas, McGowan, Nace & Gutierrez, Chartered, certify that true copies of the foregoing document were sent this 25th day of July 1994, via first class mail, postage prepaid to the following:

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Federal Communications Commission
Room 814, 1919 M Street, NW
Washington, DC 20554

Commissioner Andrew C. Barrett*
Federal Communications Commission
Room 844, 1919 M Street, NW
Washington, DC 20554

Commissioner Rachelle B. Chong*
Federal Communications Commission
Room 844, 1919 M Street, NW
Washington, DC 20554

Commissioner Susan Ness*
Federal Communications Commission
Room 832, 1919 M Street, NW
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Commissioner James H. Quello*
Federal Communications Commission
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Federal Communications Commission
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*Hand Delivery


Lydia N. Hicks